

MEMO ENDORSED

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SYRACUSE MOUNTAINS
CORPORATION,

Plaintiff,

v.

PETRÓLEOS DE VENEZUELA S.A.,

Defendant.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 6/2/22

Civil Action No. 1:21-cv-02684-VEC

**NOTICE OF DEFENDANT'S MOTION
FOR ISSUANCE OF LETTER OF
REQUEST**

PLEASE TAKE NOTICE that upon the accompanying Memorandum in Support of Defendant's Motion for Issuance of Letters of Request, and all proceedings and pleadings in this action, defendant Petróleos de Venezuela, S.A., by and through undersigned counsel, will move this Court, the United States District Court for the Southern District of New York, at the courthouse thereof, located at 40 Foley Square, New York, New York 10007, before the Honorable Valerie E. Caproni, for: issuance of a letter of request for international judicial assistance from the appropriate judicial authority of Luxembourg, pursuant to 28 U.S.C. § 1781 and Chapter I of the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters, March 18, 1970, T.I.A.S. No. 7444, 23 U.S.T. 2555, in the form annexed hereto as Exhibit 1, to obtain discovery from the non-party foreign entity Banque J. Safra Sarasin (Luxembourg) SA, and such other and further relief as the Court deems just and proper.

Dated: June 1, 2022

Respectfully submitted,

HOGAN LOVELLS US, L.L.P.

By: /s/ Dennis H. Tracey

Dennis H. Tracey

390 Madison Avenue

New York, NY 10017

Phone: (212) 918-3000

Fax: (212) 918-3100

dennis.tracey@hoganlovells.com

Richard Lorenzo (admitted *pro hac vice*)

600 Brickell Avenue, Suite 2700

Miami, FL 33131

Phone: (305) 459-6500

Fax: (305) 459-6550

richard.lorenzo@hoganlovells.com

Catherine Bratic (admitted *pro hac vice*)

609 Main Street, Suite 4200

Houston, TX 77002

Phone: (713) 632-1400

Fax: (713) 632-1401

catherine.bratic@hoganlovells.com

Counsel for Defendant

Petróleos de Venezuela, S.A.

Plaintiff must respond or indicate that it has no objection not later than **June 9, 2022**.

SO ORDERED.

Handwritten signature of Valerie Caproni in blue ink.

6/2/22

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE